

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re: JACQUELINE E. REDDING,
Debtor.

Case No. 24-24190-KMP
Chapter 13

**OBJECTION TO MOTION BY 21st MORTGAGE CORPORATION FOR RELIEF
FROM AUTOMATIC STAY AND ABANDONMENT**

Debtor Jacqueline E. Redding, through her attorneys, Lombardo Law Office, objects to the motion by 21st Mortgage Corporation for relief from automatic stay and abandonment, and in support states the following:

1. The debtor filed this case under chapter 13 on August 12, 2024.
2. The debtor mistakenly thought that her first payment came due in the first full month following the filing of her case.
3. She made a payment on September 25, 2024. She will continue to make payments so that she can successfully complete this case.
4. She is agreeable to a doomsday and to a supplemental claim for any post-petition payment arrears.

WHEREFORE, Debtor respectfully requests that the Court deny the motion and grant other relief as the Court deems just and appropriate.

Dated October 4, 2024.

Respectfully Submitted,
LOMBADO LAW OFFICE

/s/

By: _____
Attorney D. Alexander Martin

Drafted by D. Alexander Martin
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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this Certificate of Service and a copy of the attached Objection were mailed to the persons mentioned below, at their respective addresses, postage prepaid, by depositing them in the U.S. Mail on October 4, 2024:

Jacqueline Redding
10315 W. Greenfield Ave., Lot 526
Milwaukee, WI 53214

The undersigned further certifies that service of the above-referenced documents was made by ECF Notice of Electronic Filing to the following parties:

Rebecca R. Garcia, Chapter 13 Trustee
Office of the United States Trustee
Bryan Ward, Attorney for 21st Mortgage Corporation

Dated October 4, 2024.

LOMBARDO LAW OFFICE

/s/
By: _____
Mary Schmitz

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